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Keen L.A. Smith Jr.
Name
517850
Prison Number (ACCE)
Anchorage Correctional Complex East
Place of confinement
1400 East 4th Avenue
Mailing address
Anchorage, Alaska 99501
City, State, Zip
ACCE-phone# and (907) 532-6652 (Maggie Lenoir Wilder)
Telephone

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Smith Jr., Keen L.A.
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Case No. 3:24-cv-00068-JMK
(To be supplied by Court)

State Of Alaska
Alaska State Trooper
Cronin, Timothy
(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

Defendant(s).

PRISONER'S
COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Keen L.A. Smith Jr.
(print your name)

who presently resides at Anchorage Correctional Complex East - 1400 E. 4th Ave., Anch. AK 99501
(mailing address or place of confinement)

were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, State Of Alaska, Courts is a citizen of
(name)
Alaska, and is employed as a State Of Alaska/Court.
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, Alaska State Trooper Agency is a citizen of
(name)
Alaska, and is employed as a Alaska State Trooper /AST.
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, Cronin, Timothy is a citizen of
(name)
Alaska, and is employed as a Alaska State Trooper /AST.
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

*****REMINDER*****

**You must exhaust your administrative remedies before your claim can go forward.
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about July 15, 2020 or before, my civil right to
(Date)

wrongful incarceration Freedom from cruel and unusual punishment
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by State Of Alaska's State Trooper Agency
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

I believe during this month or months before I was charged with charges and held in jail against my will. I was categorized as a bad person against some kids who were "held hostages" during a Robbery, burglary, home evasion type situation. I expressed to the State Troopers, the courts & multiple lawyers that I was NOT involved in this incident but was still kept in jail. I was later released on February 24, 2022 from jail but was still being charged according to Courtview court system. It stopped me from getting help from the state due to this situation. During the incarceration I lost my mother, my grandfather, my daughter's mother, my auntie, my cousin, and a family friend which I couldn't go to their funeral due to being incarcerated and my custody level, which only stopped me, being wrongfully incarcerated on these charges.

Claim 2: On or about Sep. 15, 2020 or before, my civil right to

(Date)

freedom from unusual punishment, wrongful incarceration

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by

Timothy Cronin - State Trooper Agency

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

I believe during this month or months before I was charged with charges and held in jail even though I had absolutely nothing to do with the specific case. I expressed this to State Trooper Timothy Cronin before my incarceration then while incarcerated for unrelated matters. Then while being held in custody still for these charges my mother, grandfather, my daughters' mother, my auntie, my cousin, and a family friend passes away. I couldn't go to any of their funerals due to the seriousness of the case and my custody level which I shouldn't have been incarcerated for in the first place. I was released later (February 24th 2022). All the deaths happened in 2021. I got released to nothing and my mental is still ~~NOT~~ the same. An Alleged "Co-defendant" and I was targeted through false identity and false testimony which this Trooper Timothy Cronin knew but ignored the facts surrounding the case.

Claim 3: On or about Sep. 15, 2020 or before, my civil right to
(Date)

freedom from cruel and unusual punishment - wrongful incarceration
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by State Of Alaska - Courts
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

I believe during this month or months before I was charged with charges I had absolutely nothing to do with. During this time I stressed this to my lawyer, the courts, the federal courts via mail & phone conversations but the federal courts weren't the blame the state court was the blame. I expressed many times through my lawyers that I was NOT involved in this matter and neither was my then alleged "co-defendant" but we were targeted and accused then later we were wrongfully charged. I had to sit here and go through so much during this wrongful incarceration. My mother passing, my grandfather passing, my daughter's mother passing, my auntie passing, & so forth. I couldn't go to their funerals due to the seriousness of the charges I was facing and my custody level, the ONLY thing that stopped me from going was being wrongfully incarcerated on these charges.

D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** _____ Yes ☒ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

b. Lawsuit 2:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: _____ Dismissed _____ Appealed _____ Still pending

Issues Raised: _____

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

_____ Yes ☒ No

If your answer is "Yes," describe each lawsuit on the next page.

I believe I did file an action in Federal Court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted. I believe it was in the Same Court as now - James M. Fitzgerald, United States Court, 222 West 7th Avenue, Room 229, #4, Anchorage, Alaska 99513. Don't remember the reasoning and don't remember if I filed on this same matter and was told that I had to wait until the case was fully resolved before I could file a claim of "wrongful imprisonment". I don't remember the ~~the~~ date or anything else due to every piece of document I had being destroyed by the correctional officers at Goose Creek Correctional Center.

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a. Defendant(s): _____
- b. Name of federal court _____ Case number: _____
- c. The case was dismissed as: ___ frivolous, ___ malicious and/or ___ failed to state a claim
- d. Issue(s) raised: _____
- e. Approximate date case was filed: _____ Date of final decision: _____

4. Are you in imminent danger of serious physical injury? ___ Yes ☒ No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: _____

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 57 million ~~per day~~ } switch
2. Punitive damages in the amount of \$ 13,000 per day incarcerated
3. An order requiring defendant(s) to pay the 3,000 per day and Timothy Cronin Resigns.
4. A declaration that Timothy Cronin can not do this ~~Timothy Cronin can not do this~~
5. Other: Don't want any of the defendants to be able to do this to other human beings

Plaintiff demands a trial by jury. Yes No

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage Correctional Complex East on 03/04/2024
(Location) (Date)

[Signature]
(Plaintiff's Signature)

Original Signature of Attorney (if any)

(Date)

Attorney's Address and Telephone Number

W. ROBERT DEAN JR. SMITH JR. 011000
Anchorage Correctional Complex East
1400 East 4th Avenue
Anchorage, Alaska 99501



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